

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

# REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

December 31, 1992

GREDE FOUNDRIES INC ATTN RONALD OLSON 801 S CARPENTER AVE KINGSFORD MI 49801-5594

RE: US EPA ID Nu	mber <u>MID 006</u>	131 890		
Location: _	801 S C	CARPENTER A	AVE	
	KINGSFO	ORD MI		
In response to you	r correspondence of	SEP 28	1992	, the following
information has be	en updated:			
Location of inst Installation mai Contact change t Legal owner char Addition of wast	iling address to to nge to	801 S CAR RONALD OL: GREDE FOU		D039
If you have any qu	estions, please cal	l me at (312	) 886-6173.	
Sincerely,				
Abara Kid	de :			
Sharon Kiddon RCRA Notifications				

cc: State Agency

Waste Management Division

File



#### GREDE FOUNDRIES, INC.

GENERAL OFFICES P.O.BOX 26499 MILWAUKEE, WISCONSIN 53226-0499 TELEPHONE (414) 257-3600

GRAY IRON

IRON MOUNTAIN FOUNDRY-KINGSFORD, MICHIGAN ROBERTS FOUNDRY CO., INC.-GREENWOOD, SOUTH CAROLINA DUCTILE IRON

LIBERTY FOUNDRY-WAUWATOSA, WISCONSIN REEDSBURG FOUNDRY-REEDSBURG, WISCONSIN WICHITA FOUNDRY-WICHITA, KANSAS

STEEL

MILWAUKEE STEEL FOUNDRY-MILWAUKEE, WISCONSIN SPECIAL SERVICES

SHORT RUN SPECIALTY FOUNDRY-MILWAUKEE, WISCONSIN TOOLING CENTER-MILWAUKEE, WISCONSIN MIDLAND METAL TREATING-FRANKLIN, WISCONSIN

May 23, 1986

Ms. Randi Kim US - EPA

Region V

230 South Dearborn Street SWD - AID Chicago, IL 60604

U.S. EPA, REGION V

MAY 2 7 1986

Dear Ms. Kim:

SOLID WASIL DUMPSON U.S. EPA, REGION V

Part A Application MID 006 131 890 Co TSD PA

This letter responds to questions raised during the meeting at your office on May 1, 1986, and our telephone conversation of May 19, 1986.

At our Iron Mountain plant, Grede Foundries will institute a totally enclosed method of chemically fixing the hazardous ingredients of our cupola baghouse dust. In this way we will prevent the lead and cadmium contained in the dust from leaching out, thus enabling us to remove this material (baghouse dust) from the hazardous substance inventory.

Our method for a accomplishing this task includes the addition of calcium hydroxide or magnesium hydroxide to the stream of baghouse dust after it leaves the hopper and before it reaches the dust exit out fall. Engineering on this system has begun with the assignment of one engineer (Louis Glassman) to the project. His project includes:

- 1. Metering systems for both baghouse dust and fixing agent.
- 2. Blending system for guaranteed homogeneity.
- 3. Back up system to deal with possible break down.
- 4. Canvass of market to locate equipment and vendors that meet specified requirements.

We estimate that the complete engineering plan including drawings will be complete and ready for submittal to your office for approval in five weeks.

During the engineering study we are conducting supplementary testing of the fixing capabilities of both calcium hydroxide and magnesium hydroxide in liquid form to determine the best performance recipe for our operation. The EP Toxic Leach testing will be conducted by the CBC Aqua Search Laboratory in Milwaukee.

US - EPA Ms. Randi Kim

Following approval of the plan by your office, we estimate ten weeks in order and delivery time for the mixing/conveying system and the metering valves. When we have the equipment at the plant we can have it installed and operational in one week. We have therefore estimated that plan can be operational in sixteen weeks plus the time required for EPA approval.

Unless you have further questions, the next correspondence from this office will be the submittal of the engineering plan for your approval.

Sincerely,

GREDE FOUNDRIES, INC.

David C. Van Dyke

Director of Safety and Environmental Protection

DCVD:rm/F/14

cc: Mr. James Roberts - Michigan DNR



#### GREDE FOUNDRIES, INC.

GENERAL OFFICES P.O. BOX 26499 MILWAUKEE, WISCONSIN 53226-0499 TELEPHONE (414) 257-3600

UI Unit/Randi Kim

GRAY IRON

IRON MOUNTAIN FOUNDRY-KINGSFORD, MICHIGAN ROBERTS FOUNDRY CO., INC.-GREENWOOD, SOUTH CAROLINA DUCTILE IRON

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STEEL

MILWAUKEE STEEL FOUNDRY-MILWAUKEE, WISCONSIN

SPECIAL SERVICES

SHORT RUN SPECIALTY FOUNDRY-MILWAUKEE, WISCONSIN TOOLING CENTER-MILWAUKEE, WISCONSIN MIDLAND METAL TREATING - FRANKLIN, WISCONSIN

May 2, 1986

Mr. Y. J. Kim US. EPA Region V 230 South Dearborn Street Chicago, IL 60604

Dear Mr. Kim:

RE: 5HS-JCK-13

We were unable to respond to Ms. Ardiente's letter of March 25, 1986, within the thirty day time period specified due to uncertainties of which data specifications were required. We met with Ms. Randi Kim of US. EPA and Mr. James Roberts of Michigan DNR on May 1, 1986, to review the various options and interpretations affecting our response and now have a clearer perspective of the situation.

Grede Foundries now requests an extension of our response time to prepare a proper report for your office.

Thank You.

Sincerely,

GREDE FOUNDRIES, INC.

David C. Van Dyke

Director of Safety and Environmental Protection

DCVD:rm/F/19

MAY 0 5 1986

SOLID WASTE BRANCH U.S. EPA, REGION V

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DEPARTMENT OF DEFENSE

vessel. Dave asked if a treatment unit within the baghouse would comply with the totally enclosed treatment exemption. I said that although we would have to see the actual engineering plans first, it appears to be a possibility. We said that the treatment tank would also be a possibility. Tenally, we said that the cement mixer being used as a treatment vessel would require a permit.

Plans File fart A

5HS-JCK-13

# 25 MAR 1986

Mr. James T. Williams Vice-President Grede Foundries, Inc. Iron Mountain Foundry P.O. Box 26499 Milwaukee, WI 53226

> RE: Rart A Application MID 006 131 890

Dear Mr. Williams:

We have reviewed you request for an exemption as a totally enclosed treatment facility. This review is primarily based on the information obtained during our site investigation (December 5, 1985) conducted by Ms. Randi Kim, of my staff, and Mr. Jim Roberts, of the Michigan Department of Natural Resources. We have also recently received regulatory clarification for the application of the totally enclosed treatment exemption, at your facility, from the Office of Solid Waste, Washington, D.C. The proposed process modification, i.e. replacing the mixing truck with a treatment tank, was also considered. We have concluded that the system cannot be classified as totally enclosed because of the reasons below.

As stated in our letter of October 21, 1985, the "discharger" of the system at present is made of permeable materials; and therefore, does not prevent releases of hazardous waste into the environment during treatment. To confirm this, during your demonstration of the mixing operation, releases were witnessed. We also said that a non-stationary treatment vessel is not acceptable.

Since we have not received any definite proposals for the installation of a mixing tank, we can not determine whether the tank could technically prevent releases of hazardous waste into the environment during treatment through the use of traps, recycle lines, etc. Therefore, the central issue is whether the mixing tank would be considered directly connected to the industrial production process, satisfying one condition of a totally enclosed treatment facility as defined in 40 CFR 260.10. At your facility, the cupola is part of the industrial production process, since it produces reusable metal; and the baghouse is part of the waste treatment process, since the sludge is not associated with product or raw materials (i.e. the sludge is disposed of, not recovered for further recycling). Hence, the treatment that occurs downstream of the baghouse cannot qualify for a totally enclosed treatment exemption, since the cupola is open to the air before the hood collects the dust.

You may wish to explore alternate management practices that would exclude the emission control dust from the definition of a solid waste. Therefore, the material would not be regulated under RCRA. If the fines were returned to the cupola for metal recovery, the entire process would be viewed as closed loop recycling, and the baghouse sludge would not be considered a solid waste according to 40 CFR 261.2(e)(iii). If the sludge were reclaimed elsewhere, it also would not be considered a solid waste, according to 261.2(c)(3). Sludges being reclaimed are not solid waste unless specifically listed, and this particular sludge is not.

In addition, the system may qualify as a totally enclosed treatment process if it was engineered differently. By connecting the hood directly to the cupola, the system could then meet the criteria for being directly connected to an industrial production process. However, the treatment units must still meet the technical standards for being closed to the environment.

Since mixing the baghouse dust with bentonite clay as described would require a RCRA permit for treatment, you may wish to pursue one of these other approaches that are not regulated under RCRA. According to data from the 1981 mail survey, many waste streams of KO61 and KO69 sludge are recycled both on and off site, so you may find that recycling is a cost effective management strategy.

Changes in the processes for the treatment, storage, or disposal of hazardous waste may be made at a facility or additional processes may be added if you submit a revised Part A permit application prior to such a change (along with a justification explaining the need for the change) and if the EPA approves the change because it is necessary to comply with the interim status standards of 40 CFR Part 265, according to 40 CFR 270.72(c). The standards for chemical treatment in other than tanks, surface impoundments, and land treatment facilities state that hazardous wastes must not be placed in the treatment process or equipment if they could cause the treatment process or equipment to leak [Subpart O]. Since leaks were noted, as previously mentioned, your treatment process is not in compliance with these standards. Hence, the application revisions, explaining what process changes will occur, must be submitted.

During our site visit, we had also requested that you provide us with information regarding your clay adsorption methods. Specifically, provide laboratory data for EP toxicity tests conducted, quality control procedures (clay added vs. metal content), and specifications for the sand/clay mixture. Also include answers to questions 1, 2, and 3 of Mr. Roberts' letter to you, dated October 24, 1985.

Please submit this information as soon as possible, but no later than 30 days of the date of this letter. If you have any questions, please call Ms. Randi Kim at (312)886-6151.

Sincerely,

Ms. Edith M. Ardiente, P.F. Chief, Technical Programs Section

cc: Alan J. Howard (MDNR) Rick Karl (HVER)

5174-13

## CENTERED PAIN PETUEN FEORETE BEGINNING

Mr. James T. Williams Vice President Iron Hountain Foundry-Grede Poundries Inc. P.O. Box 26499 Milwaukee, Wisconsin 53226

> Re: Grade Foundries EPA ID NO. RID 006131898

Dear Mr. Williams:

The referenced company has submitted a Part A Basardous Waste Permit Application to treat, store, or dispose of hazardous waste under the Resource Conservation and Recovery Act (RCRA) as amended. Our records indicate, however, that the reference facility did not submit its 1) notification of hazardous waste activity or 2) Part A of the hazardous waste permit application in a timely manner and therefore does not qualify for interim status. Without having interim status a facility cannot treat, store, or dispose of hazardous waste unless that facility has a full RCFA permit. Please check your records as to the actual submittal dates. The notification of hazardous weste activity (RPA Form 8700-10) should have been submitted by August 18, 1980, and the Part A of the hazardous waste permit application (RPA Form 3500-1 and 3500-3) by Movember 19, 1960.

The United States Environmental Protection Agency (U.S. EPA) has adopted a policy that will allow facilities which failed to achieve interim status, as a result of untimely submittals, to continue to operate via the issuance of a compliance order. Before the Agency issues such an order, the actual submittal dates must be verified.

Federal regulations (40 CFR Part 265 Subpart B) require that hezardous waste treatment, storage, and disposal facilities shall provide to U.S. EPA proof of financial assurance for closure by July 6, 1983, and liability coverage by July 15, 1983, (40 CFR 265.143 and 265.147 respectively). To date U.S. EPA has not received proof of financial assurance and liability coverage. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste requirements.

Your application indicates that the referenced company treats, stores or disposes of hazardous waste; by this letter U.S. EPA is requesting that you:

- Provide U.S. EPA with your verified submission dates for your notification of hazardous waste activity and Part A of the hazardous waste permit application and
- 2. If your facility does in fact treat, store or dispose of hazardous weste, provide U.S. EFA with the appropriate financial responsibility proofs required by 40 CFR Part 265 Subpart B. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to further enforcement. RCPA provides for civil penalties up to \$25,000 per violation.

As an alternative to providing MCPA proof of financial responsibility, you may wish to discontinue operation as a treatment, storage, or disposal facility.

Enclosed are a set of instructions for withdrawing your RCRA permit application and closure of an RCRA facility.

Send your response within 30 days to:

RCRA Activities P.O. Box AJ587 Chicago, IL 60690

Mr. Thomas B. Golz, at (312) 886-4023 can provide additional information concerning the financial requirements and Dr. David Homer at (312) 886-3790 concerning the withdrawal and closure requirements.

Sincerely,

William H. Miner, Chief Technical, Permits, and Compliance Section

Enclosures

2128183 MAM 3/59

• SENDER: Complete Add your space on	Items 1, 2, 3, address in the reverse.	and 4. "RETURN TO"
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EXECUTIVE OFFICES

RECEIVED

DEC 0 5 1980

WASTE MANAGEMENT BRANCH EPA REGION V

November 28, 1980

U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, IL 60604

Gentlemen:

The attached, completed Environmental Protection Agency forms #1 and #3, together with appropriate supporting documents, constitute our application for a permit as an interim status treater of waste.

We would appreciate having this application processed through the normal approval channels. Since we did not want to delay our application longer, we have copied an old duplicate form. Should you have any question regarding the application, or any of the material supplied, please contact me at area 414, 671-2345, extension 261.

Sincerely,

GREDE FOUNDRIES, INC.

à limbi

James T. Williams Vice President

Environmental Affairs and Industrial Engineering

Encl. mav

DEC 03 1980

Submission of this form is voluntary

Department of Natural Resources STATUS CHANGE FORM
A. GENERAL INFORMATION (MDNR USE ONLY): Obtained information from the notification form or current EPA notification printout
Facility Name Found Found State U. S. EPA RI EPA ID Number County : County : County #:
Facility Location Compliance Evaluation Inspection (CEI) Date
Facility Mailing Address (if different than above)  Status as indicated on notification form:  LOG SOG CESOG TRANS TSDF
MDNR, Inspector Name/Telephone Number/District Office Col - Marquette OTHER See attach GPA Change
B. STATUS CHANGE INFORMATION - TO BE COMPLETED BY FACILITY (check all that apply):  WMD RECORD CENTER
[ ]1. NON-HANDLER This facility does not generate, transport, treat, store or dispose of any hazardous waste, and does not intend to conduct such activities in the future.
[ ]2. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)  When you add up the quantity of the hazardous waste generated in a calendar month, if the facility generates less than or equal to: 100kg or 220lbs of hazardous waste; less than 1kg or 2.2lbs of acute or sever toxicity hazardous waste; less than 100kg or 220lbs of acute hazardous waste spill cleanup material AND accumulates less than the following at any time; 1,000kg or 2,200lbs of hazardous waste; 1kg or 2.2lbs of sever toxicity hazardous waste. We intend to continue to meet these generation and accumulation requirements in the future.
When you add up the quantity of the hazardous waste generated in a calendar month, if the facility generates less than: 1,000kg or 2200lbs of hazardous waste; less than 1kg or 2.2lbs of acute or sever toxicity hazardous waste; less than 100kg or 220lbs of acute hazardous waste spill cleanup material AND accumulates less than the following at any time; 6,000kg or 13,200lbs of hazardous waste; 1kg or 2.2lbs of sever toxicity hazardous waste; 100kg or 220lbs of acute hazardous waste spill cleanup material and accumulate this waste in tanks or containers for less than 180 days (or 270 days if the designated facility is over 200 miles). We intend to continue to meet these generation and accumulation requirements in the future.
[ 14. LARGE QUANTITY GENERATOR When you add up the quantity of the hazardous waste generated in a calendar month, if the facility generates more than: 1,000kg or 2200lbs of hazardous waste; equal to or more than 1kg or 2.2lbs of acute or sever toxicity hazardous waste; equal to or more than 100kg or 220lbs of acute hazardous waste spill cleanup material AND accumulates hazardous waste in tanks or containers for 90 days or less. We intend to meet these generation and accumulation requirements in the future.
[ ]5. TRANSPORTER This facility transports hazardous waste: [] own waste [] commercial purposes by [] air, [] rail, [] highway, [] water, [] other
[ ]6. TREATMENT, STORAGE OR DISPOSAL FACILITY This facility treats hazardous waste, stores hazardous waste for more than 90 days (or the 180/270) and/or disposes of hazardous waste on-site.
[ ]7. OTHER: This facility is   [] Generator marketing hazardous waste fuel to burner   [] Other marketing hazardous waste fuel to burner   [] Other marketing hazardous waste fuel to burner   [] Burner with: [] Utility Boiler [] Industrial Boiler [] Industrial Furnace   [] Underground Injection Control   [] Generator Marketing Off-Specification Used Oil Fuel to Burner   [] Other Marketing Off-Specification Used Oil Fuel to Burner
C. CERTIFICATION:(To be completed by facility)
The following certification must be signed by the owner or operator of the facility or by an authorized representative of the facility. An "authorized representative" is a person responsible for the overall operation of the facility.
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all

attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Name (please print)	Signature	Date Signed
MONALD LOUSON	Mall Alle	21 12093
Title	Telephone Number Mailing address (if different	than above addresses)
LANT ENG MER	908-774-7850 801 SO. Call	Aus - IM
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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FEB 1 4 1994

# REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

December 31, 1992

GREDE FOÙNDRIES INC ATTN RONALD OLSON 801 S CARPENTER AVE KINGSFORD MI 49801-5594

RECEIVED WMD RECORD CENTER MAY 3 1 1994

RE:	US EPA ID Number	MID 00	6 131 8	390				
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If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

cc: State Agency

File

Please print or type with ELITE type (12 character in her inch) in the unshaded areas only

Please reier to the Instructions for Filing Natification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

# Notification of Regulated Waste Activity

United States Environmental Protection Agency

For section 1 DWS No. of the Park No. of the P Date Received (For Official Use Only)

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VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes.	Refer to Instructions.)
A. Hazardous Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2.200 lbs.) b. 100 to 1000 kg/mo (220 - 2.200 lbs.) c. Less than 100 kg/mo (220 lbs.) 4. Hazardous Waste Fuel a. Generator Marketing to b. Other Marketers c. Burner - indicate device Type of Combustion D  Mode of Transportation 1. Air 2. Rail 3. Highway 5. Underground Injection Cor 4. Water 5. Other - specify	a. Generator Marketing to Burner b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler evice 2. Industrial Boiler 3. Industrial Furnace ce 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
(X. Description of Regulated Wastes (Use additional sheets if necessary)	
A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes correspondent wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)  1. Ignitable 2. Corrosive 3. Reactive 4. EP Toxic (D001) (D002) (D003) (D000) (List specific EPA hazard X D 0 1 8 D X D 0 1 8 D X D 0 1 8 D X D 0 1 8 D 0	dous waste number(s) for the EP Toxic contaminant(s))  0 3 9  d to list more than 12 waste codes.)
X. Certification	
I certify under penalty of law that I have personally examined and amin and all attached documents, and that based on my inquiry of the obtaining the information, I believe that the submitted information that there are significant penalties for submitting false information imprisonment.  Signature  Name and Official Title (type or or	ise Individuals immediately responsible for is true, accurate, and complete. I am aware fon, including the possibility of fines and
Faul M. Ward, Works I	
XI. Comments  Waste petroleum naphtha from maintenance parts o	cleaner.
Note: Mail completed form to the appropriate EPA Regional or State Office. (See	Section III of the booklet for addresses.)

Please print or type with ELITE type (12 charantins per inch) in the unshaded areas only

Please refer to the Instructions for Filing Notification before completing this form. information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification c Regulated Waste Activity

Date Received (For Official Use Only) SEP 28

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United States Environmental Protection Agency I. Installation's EPA ID Number (Mark 'X' in the appropriate box) C. Installation's EPA ID Number B. Subsequent Notification A. First Notification X M 1 D 0 0 6 1 3 1 8 0 (complete item C) II. Name of Installation (Include company and specific site name) 0 UN D R III. Location of Installation (Physical address not P.O. Box or Route Number) Street Street (continued) State City or Town ZIP Code KI G S F 9 8 0 9 4 N 0 R D M I 4 County Code County Name 0 2 2 D I C K I N S 0 N IV. Installation Mailing Address (See instructions) Street or P.O. Box M E State ZIP Code City or Town V. Installation Contact (Person to be contacted regarding waste activities at site) Name (last) (first) S 0 L 0 L 0 N R N A D Job Title Phone Number (area code and number) G R 9 7 7 2 5 0 P L A T E NG M 0 6 4 N VI. Installation Contact Address (See instructions) A. Contact Address B. Street or P.O. Box Location Mailing State ZIP Code City or Town VII. Ownership (See instructions) A. Name of Installation's Legal Owner DR Street, P.O. Box, or Route Number 2 4 9 9 0 6 City or Town State ZIP Code 5 3 9 W I 2 6 9 M W U K E E 0 4 C. Owner Type D. Change of Owner (Date Changed) B. Land Type Year Month Day Indicator Phone Number (area code and number) No 7 0 P P Yes X 4 1 2 5 3 6 0

A. Hazardous Waste Activity  1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220 - 2,200 lbs.) c. Less than 100 kg/mo (220 lbs.) c. Less than 100 kg/mo (220 lbs.) d. For commercial purposes Mode of Transportation d. A. Hazardous Waste Fuel d. Senerator Marketing to Burner d. D. Other Marketers d. For own waste only d. Hazardous Waste Fuel d. Generator Marketing to Burner d. Burner - indicate device(s) - Type of Combustion Device d. Burner - indicate device(s) - Type of Combustion Device d. Utility Boiler d. Utility Boiler d. Utility Boiler d. Hazardous Wastes (Use additional sheets if necessary)  A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the chastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)  B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more the great of the chastes of the part of	B. Us	sed O Off-S a. G b. C c. B T Spec (or O the O	Dill Fue Specificanera Other Maumer Type o 1. 2. 3. 3. bification on-site Dill Mee	ication Marker – income	n Use Market erer dicate mbust y Boild sstrial I ssed Oner) V ee Spee ed ha	device device tion Dever Boiler Furnace il Fuel Myho Firsecification zardous	Burner (s) - vice  Marketist Clair on
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C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)		5 11 5	code	es.)		6	
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certify under penalty of law that I have personally examined and am familiar with and all attached documents, and that based on my inquiry of those individual obtaining the information, I believe that the submitted information is true, accuments there are significant penalties for submitting false information, including imprisonment.    Name and Official Title (type or print)	uals ii urate	mme e, and the p	ediate	ely in ple ibilit	resp ete. ty of	onsib I am a	le fo
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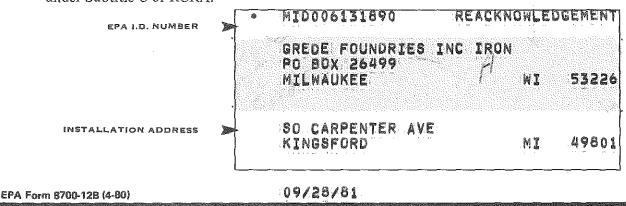
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B. HAZA specif	ARDOUS WASTES FRO	OM SPECIFIC SOURCE ur installation handles.	S. Enter the four—did Use additional sheets i	git number from 40 CFF f necessary.	Part 261,32 for each li	sted hazardous waste from
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C. COMI	MERCIAL CHEMICAL e your installation hand	PRODUCT HAZARDO les which may be a haze	OUS WASTES. Enter t ardous waste. Use add	he four—digit number fr itional sheets if necessar	om 40 CFR Part 261.33 y.	3 for each chemical sub-
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D. LISTE hospit	ED INFECTIOUS WAS tals, medical and research	TES. Enter the four-d ch laboratories your ins	igit number from 40 C tallation handles. Use	FR Part 261.34 for each additional sheets if nece	listed hazardous waste	from hospitals, veterinary
	49	50	51	52	53	54
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E. CHAF	RACTERISTICS OF NO dous wastes your install	N-LISTED HAZARD	OUS WASTES, Mark	'X" in the boxes correst	oonding to the character	ristics of non-listed
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EPA PON	m 8700-12 (6-80) REV	VEHSE				4.



#### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



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VI. FACILITY VI. LOCATION				complete and correct, you stems 1, III, V, and V1 for must be completed regard items if no label has been the instructions for detations and for the legal at	except less). provid	Com ded. item	8 which plete a Refer to descrip
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questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no"	ital for	rm li ich q	sted in the Juestion, y	submit any permit application forms to the EPA. If you anse parenthesis following the question, Mark "X" in the box in ou need not submit any of these forms. You may answer "no o, Section D of the instructions for definitions of bold-faced	the th " if y	ird co our ac	olumn
SPECIFIC QUESTIONS	1		K'X'	SPECIFIC QUESTIONS	YES	MAB	<b>デン</b> 外科
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.?		X	ATTACHED	B. Does or will this facility <i>leither existing or proposed)</i> include a concentrated animal feeding operation or aquatic animal production facility which results in a	7 8 3	Х	ATTACH
(FORM 2A)  C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in		12	: :5	discharge to waters of the U.S.? (FORM 2B)  D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to	10	zo X	21
A or B above? (FORM 2C)  E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	32	23	34 X	waters of the U.S.? (FORM 2D)  F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum con-	25	26 X	27
G. Do you or will you inject at this facility any produced	28	29	39	taining, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)  H. Do you or will you inject at this facility fluids for spe-	21	32	33
water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		Х	36	cial processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combus- tion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	X	39
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment		X	
attainment area? (FORM 5) III. NAME OF FACILITY	AQ.	41	43	area? (FORM 5)	43	44	45
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IV. FACILITY CONTACT							
A. NAME & TITLE (last, fi	T	<u>_</u>	CE	PRES . 414 671 234 5			
V. FACILITY MAILING ADDRESS	- A			45 46 - 48 49 - 51 52 - 59			
A. STREET OR P.O. 80 X 2 6 4 9 9	TT	(* e. 34.3 					
B. CITY OR TOWN	1 1	1	<u>, 28-2, 22-2</u>	C.STATE D. ZIP CODE			
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VI. FACILITY LOCATION  A. STREET, ROUTE NO. OR OTHER S	SPECI	FIC	DENTIFI	ER.			
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EPA Form 3510-1 (6-80)

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# FORM CEDA HAZ...DUS WASTE PERMIT APPLICATION

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	I. FIRST OR REVISED APPLICATION															
evised	lace an "X" in the appropriate box in A or B below <i>(mark one box only)</i> to indicate whether this is the first application you are submitting for your facility or a evised application. If this is a revised application, enter your facility's PA I.D. Number, or if this is a revised application, enter your facility's PA I.D. Number in Item I above.															
A. FI	RS	TAI	PPLICATION (place	e an "X" below an	d provide the	appro	priate d	late)				2.NEW FACILITY (C)	mplete ite	m below		
Complete item below.)  FOR NEW FACILITIES PROVIDE THE DATE													TIES,			
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B. REVISED APPLICATION (place an "X" below and complete Item I above)  1. FACILITY HAS INTERIM STATUS  2. FACILITY HAS A RCR												RCRA PEF	MIT	jydayjyjisa Esytytesty		
)	72				ACITIES							77				
A. PR ent des B. PR	III. PROCESSES - CODES AND DESIGN CAPACITIES  A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).  3. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.															
2.	Ü	IIT C	NT — Enter the amou OF MEASURE — For	each amount enter	ed in column	в(1),	enter th	ne cod	le fr	om th	e list of unit m	easure codes below that d	escribes the	unit of	No.	
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THE PROCESS CONSISTS OF MIXING CUPOLA EMISSION CONTROL DUST, WHICH MEETS EP TOXICITY CHARACTERISTICS, WITH LARGER VOLUMES OF CERTAIN OTHER NON-HAZARDOUS FOUNDRY WASTE SANDS AND DUSTS SO THAT THE RESULTING MIXTURE NO LONGER MEETS USEPA HAZARDOUS WASTE CRITERIA. THESE NON-TOXIC WASTE SANDS AND DUSTS CONTAIN BENTONITE, WHICH, IN THE NON-ACIDIC ENVIRONMENT IN WHICH THE MIXTURE IS DISPOSED, HAS THE POTENTIAL TO ATTENUATE TOXIC METALS THAT MAY BE RELEASED BY THE CUPOLA DUST. COMMON CEMENT MIXING EQUIPMENT IS BEING USED TO MIX THE WASTES.

#### IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed nazardous waste you will handle. If you handle hazardous wastes which are not fisted in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wastels) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code, Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS,		KILOGRAMS,,	<b></b> K
TONS. , ,	T	METRIC TONS	. <b></b> M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by

more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Selectione of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C, and D by estimating the total annual

quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation, in addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste, Treatment will be in an incinerator and disposal will be in a landfill.

	Γ	A. EPA						C. UNIT			D. PROCESSES											
Zο	HAZARD. WASTENO (enter code)				NO			OF MEA- SURE lenter code;		1. PROCESS CODES (enter)									DES			2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	1	5	0	5	4		900		P	T	1	) .	3	D	8	0		}		y	1	
X-2	I		0	0	2		400		P	T	T (	0.	3	D	8	0		ſ		1	ł	
X-3	1		0	0	1	Ī	100		P	T	1	) .	3	D	8	0		T		T	T	,
X-4	1		0	0	2		:				Ţ			**********	T	-		T	1	T	1	included with above

EPA Form 3510-3 (6-80)

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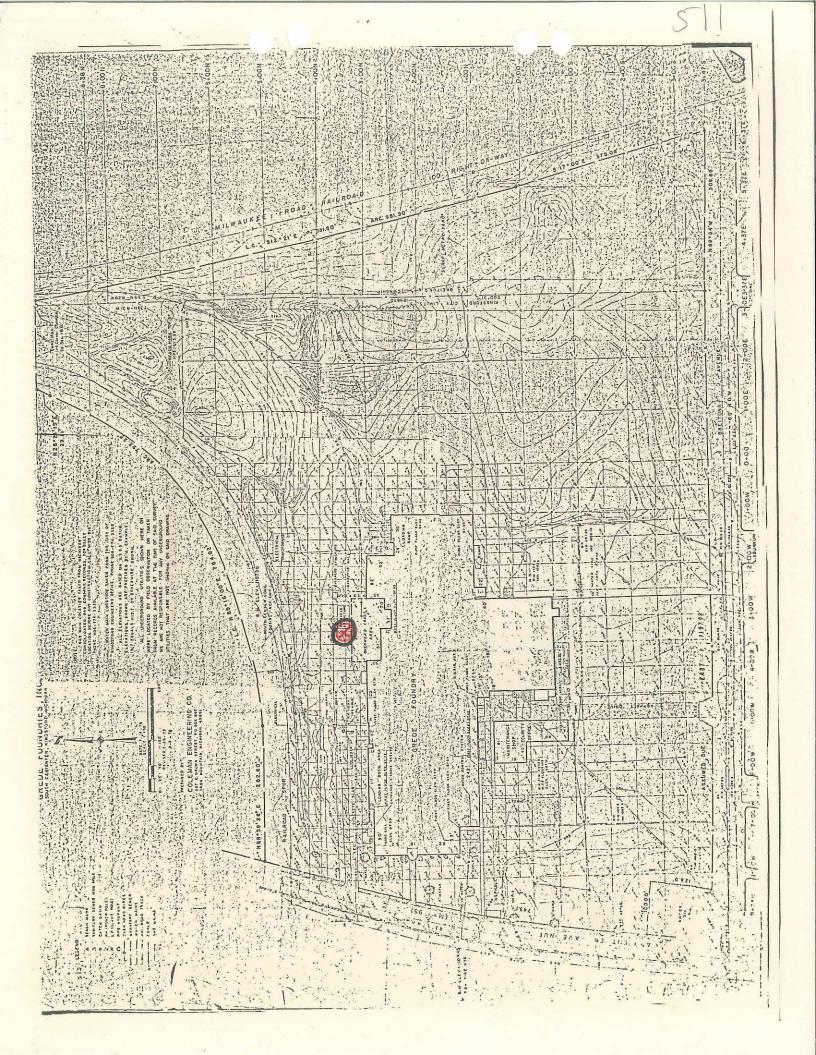
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		5/19
IV. DESCRIPTION OF HAZARDOUS WALL IN		<b>新兴岛大学和</b>
E. USE THIS SPACE TO LIST ADDITIONAL PROCESS	S CODES FROM TIEM D(T) ON PAGE 3.	
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		*
EPA I.D. NO. (enter from page 1)		
5 I L D 0 0 6 1 3 1 8 9 0 6		
V. FACILITY DRAWING		
All existing facilities must include in the space provided on page	5 a scale drawing of the facility (see instructions for more	detail).
VI. PHOTOGRAPHS  All existing facilities must include photographs (aerial o	raround—level) that clearly delineate all existing st	ructures; existing storage,
treatment and disposal areas; and sites of future storage.	treatment or disposal areas (see instructions for m	ore detail).
VII. FACILITY GEOGRAPHIC LOCATION		
LATITUDE (degrees, minutes, & seconds)	LONGITUDE degree	s, minutes, & seconds
4 5 4 8 - 2	0 8 8 0	0 4 77 79
VIII. FACILITY OWNER		
X A. If the facility owner is also the facility operator as listed skip to Section IX below.	I in Section VIII on Form 1, "General Information", place	e an "X" in the box to the left and
B. If the facility owner is not the facility operator as listed	in Section VIII on Form 1, complete the following items	r ·
I NAME OF FACILITY	'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E		
3. STREET OR P.O. BOX	4. CITY OR TOWN	55 56 - 58 189 - 61   62 - 65 5. ST. 6. ZIP CODE
F	G	
15.116		
IX. OWNER CERTIFICATION  I certify under penalty of law that I have personally example to the control of the co	mined and am familiar with the information submi	itted in this and all attached
documents, and that based on my inquiry of those indiv submitted information is true, accurate, and complete. I including the possibility of fine and imprisonment.	iduals immediately responsible for obtaining the in	formation, I believe that the
	SIGNATURE	C. DATE SIGNED
JAMES T. WILLIAMS	S. Duille	November 20 1000
VICE PRESIDENT	Xaca Con	November 28, 1980
I certify under penalty of law that I have personally exa	mined and am familiar with the information submi	itted in this and all attached
documents, and that based on my inquiry of those indivisubmitted information is true, accurate, and complete. I including the possibility of fine and imprisonment.	riduals immediately responsible for obtaining the if	ntormation, I believe that the
A. NAME (print or type)  B.	SIGNATURE	C. DATE SIGNED
EPA Form 3510-3 (6-80)	PAGE 4 OF 5	CONTINUE ON PAGE











### GREDE FOUNDRIES, INC.

GENERAL OFFICES
P.O. BOX 26499
MILWAUKEE, WISCONSIN 53226-0499
TELEPHONE 14141 257-3600

XC: HANK SWITZER, MRGH

ADRI YARE

IRON MDUNTAIN FOUNDRY -KINGSFORD, MICHIGAN ROBERTS FOUNDRY CO., INC.-GREENWOOD, SOUTH CAROLINA GREDE PERM CAST, INC.-CYNTHIANA, KENTUCKY GREDE -VASSAR, INC.-VASSAR, MICHIGAN

DUCTILE IRON

LIBERTY FOUNDRY - WAUWATOSA, WISCONSIN REEDSBURG FOUNDRY - REEDSBURG, WISCONSIN WICHITA FOUNDRY - WICHITA, KANSAS GREDE NEW CASTLE, INC. - NEW CASTLE, INDIANA

STEEL

MILWAUKEE STEEL FOUNDRY - MILWAUREE, WISCONSIN

SPECIAL SERVICES

SHORT RUN SPECIALTY FOUNDRY-MILWAUKEE, WISCONSIN FREDONIA FOUNDRY, INC. - FREDONIA, WISCONSIN

May 17, 1990

Mr. Steve Sliver
Waste Management Division
Michigan Dept. of Natural Resources
P.O. Box 30241
Lansing, Michigan 48909

Dear Steve:

Enclosed are the necessary forms for Grede Foundries, Inc., to self-insure \$2,000,000 of the hazardous waste insurance requirement. Upon the next renewal of our EIL policy with National Union we will be reducing the amount of insurance we purchase.

Should you have a problem with the preparation of these forms or want additional information please call.

Very truly yours,

GREDE FOUNDRIES, INC.

Jary A. Ertel

Assistant Treasurer

GAE:mdk:1

RECEIVED

MAY 24 1990

RECEIVED

MAY 2 1 1990

#### GREDE FOUNDRIES, INC.

EXECUTIVE OFFICES

May 3, 1983

MANG 1983

Mr. William H. Miner, Chief Technical, Permits, and Compliance Section U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Subject: Grede Foundries, Inc.

E.P.A. I.D. No. MID-006131890 PA, 6

Dear Mr. Miner:

Attached is a <u>corrected</u> copy of the binder for our Environmental Impairment Liability Insurance policy which is in the process of issuance.

Sincerely yours,

James T. Williams Vice President

JTW:ds/M/06

Attachment

cc: RCRA Activities
P.O. Box A3587
Chicago, IL 60690

William Muno U.S. E.P.A. 230 S. Dearborn St. Chicago, IL 60604



# Stewart Smith Mid Americ., Inc.

125 South Wacker Drive

Chicago, Illinois 60606

Phone (312) 236-7333



## BINDER

THIS IS TO CERTIFY that the insurance hereinafter described has been bound with GREAT AMERICAN SURPLUS LINES INSURANCE COMPANY

(hereinafter called the "Underwriters") by Stewart Smith Mid America, Inc., 125 South Wacker Drive, Chicago, Illinois 60606 under authority granted to them by the Underwriters.

Assured

GREDE FOUNDRIES, INC.

Address

on the

9898 WEST BLUE MOUND ROAD WAUWATOSA, WI 53226

Term: Effective at 12:01 A.M.

5TH day of APRIL

on the 5TH day of APRIL 1983 and ending at 12:01 A.M.
1984 Standard time at the address of assured as stated herein

Amount or Limit

\$3,000,000 ANY ONE LOSS/\$6,000,000 ALL LOSSES COMBINED EXCESS OF A \$50,000 SELF-INSURED RETENTION

Kind of Insurance

Broker

ENVIRONMENTAL IMPAIRMENT LIABILITY

This binder is subject to the following special conditions:

POLICY NUMBER:

3CM 01488

PREMIUM:

\$21,000

In the event of cancellation or expiration of this binder without a policy being issued, the Underwriters shall be entitled to an earned premium for the time in force at short rate of the annual rate as charged by the Underwriters if cancelled by the Assured; and at a pro rate of the annual rate if cancelled by the Underwriters.

It is expressly understood and agreed by the Assured by accepting this instrument that Stewart Smith Mid America, Inc., is

not an Insurer hereunder and shall not be liable in any way nor to any extent whatever for any loss or claim.

Dated at Chicago, Illinois, this -MARSH & MCLENNAN 2877

APRIL

10 83

222 SOUTH RIVERSIDE PLAZA

CHICAGO, IL 60606

CAG/mtg

Otewari Onnul min Auser va., ut

SENIOR VICE PRESIDENT

#### GREDE FOUNDRIES, INC.

EXECUTIVE OFFICES

April 25, 1983

Mr. William H. Miner, Chief Technical, Permits, and Compliance Section U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Subject: Grede Foundries, Inc.

E.P.A. I.D. No. MID-006131890

Dear Mr. Miner:

Attached is a copy of the binder for our Environmental Impairment Liability Insurance policy which is in the process of issuance.

We are working through the detail of financial assurance for closure and should have that to you shortly.

Sincerely yours,

James T Williams Vice President

JTW:ds/M/06

Attachment

cc: RCRA Activities P.O. Box A3587 Chicago, IL 60690

> William Muno U.S. E.P.A. 230 S. Dearborn St. Chicago, IL 60604

RECEIVED
APR 27 1983

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WASTE MANAGEMENT BRANCH

# Ste . irt Smith Mid America, Inc.

125 South Wacker Drive

Chicago, Illinois 60606

Phone (312) 236-7333



# BINDER

THIS IS TO CERTIFY that the insurance hereinafter described has been bound with GREAT AMERICAN SURPLUS LINES INSURANCE COMPANY

(hereinafter called the "Underwriters") by **Stewart Smith Mid America, Inc.**, 125 South Wacker Drive, Chicago, Illinois 60606 under authority granted to them by the Underwriters.

Assured GREDE FOUNDRIES, INC.

Address 9898 WEST BLUE MOUND ROAD WAUWATOSA, WI 53226

Term: Effective at 12:01 A.M. on the 5TH day of APRIL 1983 and ending at 12:01 A.M. on the 5TH day of APRIL 1984 Standard time at the address of assured as stated herein

Amount or Limit

\$3,000,000 ANY ONE LOSS/\$6,000,000 ALL LOSSES COMBINED EXCESS OF A \$50,000,000 SELF-INSURED RETENTION

Kind of Insurance

Broker

ENVIRONMENTAL IMPAIRMENT LIABILITY

This binder is subject to the following special conditions:

POLICY NUMBER: 3CM 01488 PREMIUM: \$21,000

In the event of cancellation or expiration of this binder without a policy being issued, the Underwriters shall be entitled to an earned premium for the time in force at short rate of the annual rate as charged by the Underwriters if cancelled by the Assured; and at a pro rata of the annual rate if cancelled by the Underwriters.

It is expressly understood and agreed by the Assured by accepting this instrument that Stewart Smith Mid America, Inc., is

not an Insurer hereunder and shall not be liable in any way nor to any extent whatever for any loss or claim.

MARSH & MCLENNAN

222 SOUTH RIVERSIDE PLAZA

Dated at Chicago, Illinois, this 11TH day of APRIL

CHICAGO, IL 60606

Stewart Smith Mid America, Inc

SENIOR VICE PRESIDENT

CAG/mtg

### ARTHUR ANDERSEN & Co.

MILWAUKEE, WISCONSIN

To the Shareholders and the

Board of Directors of

Grede Foundries, Inc.:

We have examined the balance sheet of GREDE FOUNDRIES, INC. (a Wisconsin corporation) as of October 30, 1982, and October 31, 1981, and the related statements of income, reinvested earnings and changes in financial position for the fiscal years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the financial position of Grede Foundries, Inc. as of October 30, 1982, and October 31, 1981, and the results of its operations and the changes in its financial position for the fiscal years then ended, in conformity with generally accepted accounting principles applied on a consistent basis.

ARTHUR ANDERSEN & CO.

Milwaukee, Wisconsin,
November 22, 1982.

GREDE FOUNDRIES, INC.

BALANCE SHEET -- OCTOBER 30, 1982, AND OCTOBER 31, 1981

ASSETS	1982	1981	LIABILITIES AND SHAREHOLDERS' EQUITY	1982	1981
CURRENT ASSETS: Cash Marketable securities, at cost	\$ 726,000	-	CURRENT LIABILITIES:  Current maturities of long-term debt Accounts payable	\$ 1,125,000 2,917,000	\$ 994,000 6,644,000
which approximates market Accounts receivable, less allowance for doubtful accounts of \$150,000		11,350,000	Accrued expenses- Salaries, wages, commissions and bonuses	1,406,000	
and \$85,000, respectively Inventories (Note 1) Refundable income taxes (Note 6)	4,979,000 4,565,000 4,071,000	15,510,000 7,760,000	Taxes, other than income Retirement benefits (Note 2) Federal and state income taxes (Note 6)	528,000 236,000 265,000	
Other	827,000	1,296,000  36,261,000	Other  Total current liabilities	510,000	568,000  15,209,000
Total current assets	19,498,000	30,201,000	Total editent itabilities	0,967,000	17,207,000
OTHER ASSETS:  Cash surrender value of officers'  life insurance, less policy loans  of \$1,996,000 and \$1,916,000,			LONG-TERM DEBT (Note 4)	9,244,000	8,528,000
respectively Industrial revenue bond funds in trust (Note 8)	112,000	84,000 962,000	DEFERRED PENSION (Note 2)	750,000	-Sir-
Nonoperating properties (land, buildings and equipment) at cost less accumulated depreciation of \$6,466,000 and \$30,000,	, ,	•	DEFERRED FEDERAL INCOME TAXES (Note 6)	239,000	213,000
respectively (Note 9) Other	3,520,000 452,000	15,000 81,000	SHAREHOLDERS' EQUITY: Capital stock- Preferred, 5% cumulative, \$100 par		
Total other assets	5,498,000	1,142,000	value (authorized, 12,500 shares; outstanding, 84 and 151 shares,		
PROPERTY, PLANT AND EQUIPMENT (Note 1 Land, buildings and improvements Machinery and equipment	): 11,844,000 40,780,000		respectively) Common, Class A, voting, \$10 par value (authorized, 200,000 shares;	9,000	15,000
Improvements in process	411,000	325,000	outstanding, 96,578 shares) Common, Class B, voting, \$1 par	966,000	966,000
	53,035,000	54,670,000	value (authorized, 250,000 shares; outstanding, 196,350 shares)	196,000	196,000
Less- Accumulated depreciation	26,801,000	30,658,000	Additional paid-in capital Reinvested earnings	232,000 32,607,000	232,000 36,056,000
Net property, plant and equipment	26,234,000	24,012,000	Total shareholders' equity	34,010,000	37,465,000
	\$51,230,000	\$61,415,000		\$51,230,000	\$61,415,000

The accompanying notes to financial statements are an integral part of this balance sheet.

# STATEMENT OF INCOME

### FOR THE YEARS ENDED

# OCTOBER 30, 1982, AND OCTOBER 31, 1981

	1982	1981
NET SALES	\$ 55,507,000	\$ 93,331,000
COST OF SALES	52,323,000	75,411,000
Gross income	3,184,000	17,920,000
SELLING AND ADMINISTRATIVE EXPENSES	7,269,000	8,659,000
OTHER INCOME (EXPENSE): Interest expense Interest income Other, net	(970,000) 1,349,000 10,000	(1,122,000) 1,210,000 (302,000)
	389,000	(214,000)
<pre>Income (loss) from continuing   operations before provision   (credit) for income taxes</pre>	(3,696,000)	9,047,000
PROVISION (CREDIT) FOR INCOME TAXES (Note 6): Current Deferred	(2,013,000) (165,000)	3,624,000 266,000
	(2,178,000)	3,890,000
Income (loss) from continuing operations	(1,518,000)	5,157,000
DISCONTINUED OPERATIONS (Note 9): Loss from discontinuance of operations and plant shutdowns, net of income tax benefits of \$1,551,000 and \$557,000 in 1982 and 1981, respectively	(1,466,000)	(738,000)
NET INCOME (LOSS)	\$ (2,984,000)	\$ 4,419,000
PER SHARE (Note 1): Income (loss) from continuing operations- Class A Class B	\$(13.06) (1.31)	\$44.37
Net income (loss)- Class A Class B	\$(25.68) (2.57)	\$38.02 3.80

The accompanying notes to financial statements are an integral part of this statement.

### STATEMENT OF REINVESTED EARNINGS

# FOR THE YEARS ENDED

# OCTOBER 30, 1982, AND OCTOBER 31, 1981

	1982	1981
REINVESTED EARNINGS AT BEGINNING OF THE YEAR	\$36,056,000	\$32,102,000
NET INCOME (LOSS)	(2,984,000)	4,419,000
LESS CASH DIVIDENDS:  5% Preferred Stock\$5 per share in		
both years	1,000	1,000
Class A Common Stock\$4.00 per share in 1982 and 1981 Class B Common Stock\$0.40 per share	386,000	386,000
in 1982 and 1981	78,000	78,000
	465,000	465,000
REINVESTED EARNINGS AT END OF THE YEAR	\$32,607,000	\$36,056,000

The accompanying notes to financial statements are an integral part of this statement.

# STATEMENT OF CHANGES IN FINANCIAL POSITION

# FOR THE YEARS ENDED

# OCTOBER 30, 1982, AND OCTOBER 31, 1981

	1982	1981
WORKING CAPITAL WAS PROVIDED FROM: Operations-	A(1 F10 000)	Å F 153 000
Net income (loss) from continuing operations Add-	\$(1,518,000)	\$ 5,157,000
Depreciation and amortization	5,841,000	6,009,000
Deferred income taxes Loss on disposal of assets	(165,000) 24,000	266,000 314,000
	5,700,000	6,589,000
Total working capital provided from continuing operations	4,182,000	11,746,000
Loss from discontinued operations Loss on writedown of assets	(1,466,000) 410,000	(738,000)
Proceeds from additional long-term loans	1,980,000	1,000,000
Proceeds from life insurance policy loans Deferred pension	80,000 750,000	178,000
Future income tax benefits	191,000	_
Other	63,000	34,000
Total working capital provided	6,190,000	12,220,000
WORKING CAPITAL WAS USED FOR: Purchase of property, plant and equipment Retirement of preferred stock Dividends paid Reduction of long-term debt Industrial revenue bond funds in trust Other	12,066,000 6,000 465,000 1,264,000 452,000 478,000	3,828,000 3,000 465,000 994,000 962,000 162,000
Total working capital used	14,731,000	6,414,000
INCREASE (DECREASE) IN WORKING CAPITAL	\$(8,541,000)	\$ 5,806,000
CHANGES IN COMPONENTS OF WORKING CAPITAL: Increase (decrease) in current assets- Cash and marketable securities Accounts receivable Inventories Refundable income taxes, net Other	\$(6,639,000) (10,531,000) (3,195,000) 4,071,000 (469,000)	\$ 5,933,000 5,165,000 (158,000) (1,959,000) 445,000
	(16,763,000)	9,426,000
Increase (decrease) in current liabilities- Notes payable to banks	CT CO. 140 MA DA CT TO 144 44 44 45	an
Current maturities of long-term debt	131,000	65,000
Accounts payable Accrued expenses	(3,727,000) (4,626,000)	628,000 2,927,000
	(8,222,000)	3,620,000
INCREASE (DECREASE) IN WORKING CAPITAL	\$(8,541,000)	\$ 5,806,000

The accompanying notes to financial statements are an integral part of this statement.

#### NOTES TO FINANCIAL STATEMENTS

### OCTOBER 30, 1982, AND OCTOBER 31, 1981

# (1) Summary of Significant Accounting Policies-

#### (a) Inventories-

Inventories accounted for using the last-in, first-out method ("LIFO") (approximately 66% in 1982 and 74% in 1981) are stated at cost which does not exceed market. The remaining inventories are stated at the lower of cost or market using the first-in, first-out method. If the first-in, first-out method had been used by the Company to cost all inventories, they would have been \$2,450,000 and \$3,420,000 higher than reported at October 30, 1982, and October 31, 1981, respectively.

During 1982, the Company liquidated certain LIFO inventories that were carried at lower costs prevailing in prior years. The effect of this action was to increase income from continuing operations before provision for income taxes by \$940,000.

# (b) Property, Plant and Equipment-

Depreciation on assets purchased prior to January 1, 1981, is based on the sum-of-the-years digits method for both financial reporting and tax purposes. Assets acquired subsequent to that time are depreciated on the straight-line method for financial reporting and under the Accelerated Cost Recovery System for tax purposes. The impact of this change for financial reporting is not material to the reported results of operations for 1981.

Ordinary maintenance and repair items are charged directly against current operations. Assets are removed from the books in the year they become fully depreciated.

# (c) Net Income (Loss) Per Share of Common Stock-

Net income (loss) per share of common stock was computed by dividing net income (loss), less dividends on preferred stock, by the number of common shares outstanding after giving effect to the relative par value of each class of stock.

# (2) Deferred Profit Sharing and Retirement Plans-

The Company has a deferred profit sharing plan for salaried employees. There were no amounts provided in 1982. The amount charged to operations in 1981 was \$780,000 and was funded currently.

The Company also has a deferred compensation plan for key executives providing for periodic payments upon retirement. Amounts charged to operations in the current year were not significant.

The Company has retirement plans for all salaried and hourly employees. The costs charged to operations in 1982 and 1981 were \$750,000 and \$1,315,000, respectively. The Company's policy is to provide and contribute amounts sufficient to satisfy the funding requirements of the Employee Retirement Income Security Act (ERISA). Amounts provided in 1982 are not required to be funded currently, and accordingly, are classified as a noncurrent liability.

A comparison of accumulated plan benefits and plan net assets for the Company's retirement plans is presented below:

Actuarial present value of accumulated plan benefits:

	May 30, 1982	May 30, 1981
Vested	\$ 6,523,000	\$ 8,216,000
Nonvested	1,539,000	1,244,000
	\$ 8,062,000	\$ 9,460,000
Net assets available for benefits	\$11,371,000	\$12,748,000

The assumed rate of return used in determining the actuarial present value of accumulated plan benefits was 7%.

# (3) Unused Lines of Credit-

The Company had unused lines of credit of \$7,000,000 as of October 30, 1982, and October 31, 1981.

## (4) Long-Term Debt-

Long-term debt consists of the following:

	1982	1981
11.083% promissory notes payable in equal annual installments of \$750,000	\$ 6,000,000	\$6,750,000
5-3/4% - 6-1/4% industrial revenue bonds payable in equal annual installments of \$50,000	600,000	650,000
5-3/8% - Small Business Administration note payable in equal monthly installments of \$6,489, including interest	358,000	466,000
9-1/2% mortgage note payable in equal month1 installments of \$6,663, including interest	y 638,000	656,000
Industrial revenue bonds, variable interest rate currently at 9.75%, payable in equal annual installments of \$132,000	1,868,000	1,000,000
Note payable, interest rate currently at 12% payable in equal quarterly installments of \$25,000	905,000	<del>-</del> .
	10,369,000	9,522,000
Less- Portion included in current liabilities	1,125,000	994,000
	\$ 9,244,000	\$8,528,000

# (5) Commitments-

Total rent expense, principally for the truck fleet and office operations, amounted to \$1,640,000 and \$1,773,000 for the years 1982 and 1981, respectively. Minimum aggregate rental requirements under noncancelable operating leases over the next five years total approximately \$475,000.

# (6) Income Taxes-

The difference between the normal Federal income tax rate of 46% and the effective tax rate (provision (credit) for income taxes as a percentage of pretax income (loss)) of 55.6% and 43.0% in 1982 and

1981, respectively, is due primarily to state income taxes and investment tax credits. Investment tax credits were \$1,026,000 in 1982 and \$282,000 in 1981, and are treated as reductions in the income tax provision in the year the qualified property is acquired.

Future income tax benefits and deferred income taxes have been provided in the applicable years to recognize the difference in timing of certain costs for financial statement purposes from that permitted for income tax purposes.

The refundable income tax of \$4,071,000 reflected on the balance sheet in 1982 results from the carryback of the net operating loss and the investment credit carryback. At October 30, 1982, the Company has available a net tax benefit of \$370,000 arising from state net operating loss carryforwards and other credits.

#### (7) Common Stock-

The holder of the common stock Class A and the common stock Class B shall be entitled to receive dividends equally at the same rate percentage of par value of such stock. The common stock of each class shall be entitled to one vote for each share of each class.

#### (8) Industrial Revenue Bond Funds in Trust-

At October 30, 1982, \$1,414,000 have not been expended from the proceeds of the City of Kingsford Economic Development Limited Obligation Revenue Bonds and the City of Milwaukee Industrial Development Revenue Bonds. These funds are committed to purchase additional plant equipment in the next two years under the terms of the bond agreements.

#### (9) Discontinued Operations and Plant Shutdowns-

The Company has permanently closed its Spring City Foundry and suspended operations at its Hutchinson and Short Run Specialty Foundries. It is anticipated that assets comprised of land, building and equipment related to Spring City will be sold early in 1983 for an estimated loss of \$395,000, net of tax. This loss is included in the \$1,466,000 current year after-tax loss. The Hutchinson and Short Run Specialty Foundries may be reopened in the future. The fixed assets of the above foundries are classified in the accompanying balance sheet under nonoperating properties.

Sales and after-tax (loss) income applicable to these operations are detailed below:

	Sal	es	After-tax (Loss) Income			
	1982	1981	1982	\$(359,000) (461,000) 82,000		
Spring City Hutchinson SRS Foundry	\$ 5,457,000 1,179,000 689,000	\$14,346,000 2,898,000 1,480,000	\$(1,221,000) (227,000) (18,000)			
Total	\$ 7,325,000 =========	\$18,724,000	\$(1,466,000)	\$(738,000)		

### ENVIRONMENTAL PROTECTION AGENCY

# FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS  See instructions before completing this section.  This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983.	Explain your non-regulated status in the space below.					
Please print/type with elite type (12 characters per inch)						
II. FACILITY EPA I.D. NUMBER  T/A C  F M I D 0 0 6 1 3 1 8 9 0 1 1 1 1 2 1 3 1 4 15	This Facility's Non-Regulated Status is Expected to Apply:  For 1983 Only Permanently  Other (explain in comment section)					
1 2 15 14 15	C303 ENTRY (OFFICIAL USE ONLY): □					
W NAME OF FACILITY	C303 ENTRY (OFFICIAL OSE ONE) A E					
III. NAME OF FACILITY    I   R   O   N   M   O   U   N   T   A   I   N   F   O   U   N   D   R  30	Y,,,,G,R,E,D,E,,F,O,U,N,D,R,I,E,S,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
IV. FACILITY MAILING ADDRESS						
3 8 0 1     S   O   U   T   H     C   A   R   P   E   N   T   E   R	A  V  E  N  U  E        45					
Street or P.O. Box    4   K   I   N   G   S   F   O   R   D   ,	M  I 4  9  8  0  1    41 42 47					
V. LOCATION OF FACILITY (if different than section IV	above)					
5						
6						
VI. FACILITY CONTACT  2 J A M E S   T .    W I L L I A M S    15 16	45					
Name (last and first)	MATES FOR FACILITIES					
	1 1 2 6 9 \$ 1 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
	for Facility Closure  B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)					
VIII. CERTIFICATION  I certify under penalty of law that I have personally examined and am documents, and that based on my inquiry of those individuals immedi submitted information is true, accurate, and complete. I am aware that including the possibility of fine and imprisonment.  James T. Williams, V.P.	ately responsible for obtaining the information, I believe that the there are significant penalties for submitting false information,  2/21/84					
Print/Type Name Title Signature	of Authorized Representative Date Signed					

# Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

	Date rec	:'d:	Rec'd by:		X1. (	GENERATO	R NAME	(specify genera		
			LITY'S EPA I.D. NO.  D 0 0 6 1 3 1 8 9 0 11  13 14 15		j.	whom all wass Iron Mou Grede Fo	ntain 1		on-site 🛭	۵
	1 2		13 14 15		XII.	GENERAT	OR ADD	RESS		
	X. GEN	NEF	RATOR'S EPA I.D. NO.			See IV.				
	[G   M   ]	IļI	0 0 0 0 6 1 3 1 8 9 0 28							
	XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)  S01         N O N E   T   S02									
	XIV. W	AS	TE IDENTIFICATION							to a
Seq	uence #	# e	A. Description of Waste	(se	Wast ee inst	ructions)	C. Handling Method	D. Amount	of Waste	E. Unit of Measure
29	1   32	1	Cupola Emission Control Dust	D   0   33   41	36	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 6 37 40 45 48	T <sub>1</sub> 4 <sub>1</sub> 7	52	2 3 3	Т
1	1 1	2	Same Waste				D, 8, 1			
		3			1					
		4								
		5								
		6								
		7								
		8								
		9					1 1			
_	1 1	10								
		11		-				7 1 1		
		12	v x							
		12								

#### XV. COMMENTS (enter information by section number—see instructions)

The amount of waste shown is the amount of Cupola Emission Control Dust that was generated in 1983. It was treated with clay bearing spent foundry sand to render it non-hazardous before it left our site for the landfill. Density is about one ton per cubic yard.

Since the material disposed of is non-hazardous, and since we do not own or operate the landfill, no groundwater monitoring data is available. However, extensive research done by the University of Wisconsin and Residuals Management Technology, both of Madison, Wisconsin, shows that this type of waste is non-hazardous and does not leach hazardous material.

EXECUTIVE OFFICES

February 21, 1984

RCRA Activities EPA Region V P. O. Box A-3587 Chicago, Illinois 60690-3587

Attention: Biennial Report

Gentlemen:

Enclosed is the FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983 for our Iron Mountain Foundry, Kingsford, Michigan.

If you have any questions, please call me at 414-257-3600. Thank you.

Sincerely yours,

James T. Williams Vice President

JTW:ds/T/07

Enclosure